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Corp.; WanZhu “Kathryn” Li; Robert M.

Milliken

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

American Rena International Corp., a
California corporation; WanZhu
“Kathryn” Li, an individual; and Robert
M. Milliken, an individual,

Plaintiffs,

vs.

Sis-Joyce International Co., Ltd., a
California corporation; Alice “Annie”
Lin, an individual; Robert Simone, an
individual; Christine Ko, an individual;
and DOES 3-10,

Defendants.

CASE NO. CV-12-06972-FMO (JEMx)

**DECLARATION OF RYAN Q.
KEECH IN SUPPORT OF
PLAINTIFFS’ REQUEST TO
ENTER DEFAULT AGAINST
DEFENDANTS ROBERT SIMONE
AND CHRISTINE KO**

DECLARATION OF RYAN Q. KEECH

I, Ryan Q. Keech, declare as follows:

1. I am a member of the bar of the State of California and an associate with Quinn Emanuel Urquhart & Sullivan LLP, attorneys for plaintiffs American Rena International Corp., WanZhu “Kathryn” Li, and Robert M. Milliken. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Plaintiffs filed their complaint against Sis-Joyce International Co. Ltd.; Alice “Annie” Lin; Virginia Wu; and Does 1-10 on August 13, 2012. (Dkt. 1). On September 11, 2012, plaintiffs substituted Robert Simone as “Doe 1.” (Dkt. 22).

3. Despite plaintiffs’ extensive efforts, Simone evaded service by concealing his identity and physical location. Accordingly, plaintiffs filed for leave to serve via Simone via alternative means (Dkt. 46), which this Court granted on October 23, 2012. Attached hereto as **Exhibit A** is a true and correct copy of the Court’s Order Authorizing Service on Defendant Robert Simone via Alternative Means (Dkt. 50). Plaintiffs served the Summons and Complaint on Simone by e-mail on October 24, 2012 (Dkt. 53).

4. Simone did not appear or respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. On November 16, 2012, plaintiffs filed for default, which the Clerk of the Court entered on December 11, 2012. (Dkts. 60, 74).

5. On March 27, 2013, with leave of the Court, plaintiffs filed an amended complaint that added new theories of liability and factual predicates, and that added Christine Ko as a defendant. Attached hereto as **Exhibit B** is a true and correct copy of plaintiffs’ First Amended Complaint in this action, *American Rena Int’l Corp., et al. v. Sis-Joyce Int’l Co., Ltd., et al.*, Case No. CV-12-06972-FMO (JEMx), filed as Dkt. 108.

quinn emanuel

6. Attached hereto as **Exhibit C** is a true and correct copy of the Proof of Service of Summons and First Amended Complaint on defendant Robert Simone (Dkt. 122) reflecting e-mail service of the Summons and First Amended Complaint on defendant Robert Simone on April 1, 2013.

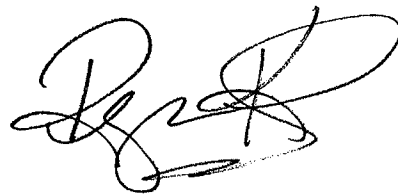
7. Attached hereto as **Exhibit D** is a true and correct copy of the Proof of Service of Summons and First Amended Complaint on defendant Christine Ko (Dkt. 121), reflecting service of the Summons and First Amended Complaint on defendant Christine Ko on April 5, 2013.

8. Under this Court's order dated March 26, 2013 (Dkt. 107), attached hereto as **Exhibit E**, defendant Robert Simone was required to respond, answer or otherwise plead to plaintiffs' complaint by April 11, 2013. Neither defendant Robert Simone nor anyone claiming to represent defendant Robert Simone has contacted plaintiffs or their counsel to request an extension to respond to plaintiffs' First Amended Complaint.

9. Under Rule 12, defendant Christine Ko was required to respond, answer or otherwise plead to plaintiffs' complaint by April 26, 2013. Neither defendant Christine Ko nor anyone claiming to represent defendant Christine Ko has contacted plaintiffs or their counsel to request an extension to respond to plaintiffs' First Amended Complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 6, 2013, at Los Angeles, California.



Ryan Q. Keech

Exhibit A

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
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7 Attorneys for American Rena International
Corp.; WanZhu "Kathryn" Li; Robert M.
8 Milliken

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION
12

13 American Rena International Corp., a
14 California corporation; WanZhu
"Kathryn" Li, an individual; and Robert
15 M. Milliken, an individual,

16 Plaintiffs,

17 vs.

18 Sis-Joyce International Co., Ltd., a
California corporation; Alice "Annie"
19 Lin, an individual; Virginia Wu, an
individual; Robert Simone, an
20 individual; and DOES 2-10,

21 Defendants.
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CASE NO. CV12-6972-DMG (JEMx)
**ORDER AUTHORIZING SERVICE
ON DEFENDANT ROBERT
SIMONE VIA ALTERNATIVE
MEANS [46]**

1 THE COURT, having considered Plaintiffs' *ex parte* application for
2 leave to serve Defendant Robert Simone by alternative means, the other pleadings
3 and papers on file in this action, and GOOD CAUSE appearing therefor,

4 IT IS HEREBY ORDERED THAT:

5 Plaintiffs may serve Defendant Robert Simone with the Summons,
6 Complaint, Amended Complaint, and any other papers required to be served upon
7 Mr. Simone, including without limitation any motions, applications, notices and
8 discovery requests, at the following e-mail addresses: robsimonetalks@yahoo.com,
9 renausal@gmail.com, and submitmystuff@yahoo.com. Service shall be made by e-
10 mail sent to all of these addresses. Service of any papers served in accordance with
11 this Order on Mr. Simone will be deemed complete upon successful e-mail
12 transmission, and such e-mail may be filed as proof of service upon Mr. Simone.

13
14
15 DATED: October 23, 2012


Dolly M. Gee
United States District Judge

Exhibit B

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12 Attorneys for American Rena International
13 Corp., WanZhu "Kathryn" Li, and Robert
14 M. Milliken

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

18 American Rena International Corp., a
19 California corporation; WanZhu
20 "Kathryn" Li, an individual; and Robert
21 M. Milliken, an individual,

22 Plaintiffs,

23 vs.

24 Sis-Joyce International Co., Ltd., a
25 California corporation; Alice "Annie"
26 Lin, an individual; Robert Simone, an
27 individual; Christine "Nina" Ko, an
28 individual; and DOES 3-10,

Defendants.

CASE NO. 12-06972-FMO (JEMx)

**FIRST AMENDED COMPLAINT
FOR:**

1. **FEDERAL TRADEMARK
INFRINGEMENT;**
2. **COMMON LAW TRADEMARK
INFRINGEMENT;**
3. **TRADEMARK
CANCELLATION;**
4. **FEDERAL UNFAIR
COMPETITION;**
5. **COPYRIGHT
INFRINGEMENT;**
6. **VIOLATION OF THE ANTI-
CYBERSQUATTING
CONSUMER PROTECTION
ACT;**
7. **TRADE SECRET
MISAPPROPRIATION;**
8. **INTERFERENCE WITH
PROSPECTIVE ECONOMIC
ADVANTAGE;**
9. **TRADE LIBEL;**
10. **FALSE LIGHT INVASION OF
PRIVACY;**
11. **VIOLATION OF RIGHT OF**



- 1 PUBLICITY;
2 12. CALIFORNIA STATUTORY
3 UNFAIR COMPETITION;
4 13. CALIFORNIA COMMON LAW
5 UNFAIR COMPETITION;
6 14. RACKETEER INFLUENCED
7 AND CORRUPT
8 ORGANIZATIONS ACT
9 VIOLATION;
10 15. CONSPIRACY TO VIOLATE
11 RICO; AND
12 16. UNJUST ENRICHMENT
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14 JURY TRIAL DEMAND
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1 Plaintiffs American Rena International Corp. ("Rena"), WanZhu ("Kathryn")
2 Li, and Robert M. Milliken ("Milliken") complain and allege as follows against
3 defendants Sis-Joyce International Co. Ltd., ("Sis-Joyce"), Alice "Annie" Lin
4 ("Lin"), Robert Simone ("Simone"), Christine "Nina" Ko ("Ko"), and DOES 3-10:

5 **NATURE OF THE ACTION**

6 1. This is an action to prevent the complete theft of a business – lock,
7 stock, and barrel. Plaintiff WanZhu "Kathryn" Li is an entrepreneur who began
8 manufacturing and distributing skincare products in Los Angeles, California in
9 2006. The company she founded, plaintiff Rena, quickly grew to directly employ 20
10 persons in California. By 2010 Rena generated \$30 million in annual sales, with the
11 bulk of that sum resulting from exports to the People's Republic of China and other
12 countries in Asia.

13 2. Defendant Lin, Simone, and Ko were customers and independent
14 sales agents for Rena's products who embarked on a brazen scheme to compete
15 unfairly with Rena and, ultimately, steal its business altogether. Initially, Lin
16 engaged in straightforward counterfeiting – she manufactured counterfeit labels
17 using Rena's proprietary RENA and RENA BIOTECHNOLOGY marks, applied
18 them to generic bottles, and then sold adulterated RENA products she had purchased
19 from Rena in competition with Rena. When Rena learned of Lin's perfidy in late
20 2010, it cut off her supply of RENA products. On information and belief, Lin then
21 attempted to pass off bottles of tap water as genuine RENA products.

22 3. Lin was neither deterred by Rena's cutting off her supply of
23 products nor satisfied with the harm she had caused through their counterfeiting. On
24 the contrary, when Rena sought to put an end to her counterfeiting of authentic
25 RENA products, Lin, with the help of defendants Simone and Ko, embarked on a
26 secret campaign to co-opt the market for RENA products, and to hijack Rena's
27 entire business. Operating under the name of defendant Sis-Joyce, Lin secretly told
28 Rena's consumers that Rena was out of business and that defendant Sis-Joyce – an

1 entity owned by Lin – now sold RENA products. With the help of Simone and Ko,
2 Lin released and distributed a competing product called “ARëna,” which defendants
3 labeled as “new” and “improved.” Defendants went so far as to claim in marketing
4 materials that “**Rena is Now aRena!**,” and described “ARëna” as an “Activation
5 Energy Serum” – the same description that Rena uses for its product. Lin also
6 falsely told Rena’s independent sales agents and customers that Rena had been
7 acquired by “ARëna” or sold its proprietary product formulas to “ARëna,” and that
8 Rena’s “new” products *were* “ARëna.” Simone, with the knowledge or constructive
9 knowledge of the other defendants, launched websites, including
10 www.RenaSkin.com and www.ArenaSkin.com, which blatantly misappropriate
11 Rena’s trademark, copy vast quantities of copyrighted materials from Rena’s
12 website, included the names and photographs of *Rena*’s founders, and sold
13 defendants’ infringing “ARëna” products. Simone also launched YouTube videos
14 displaying and advertising *Rena*’s products and trademarks, but directing the public
15 to defendants’ knockoff websites. Defendants sold their “ARëna” products in
16 bottles that precisely copy the highly distinctive .51 oz plastic bottle designed by
17 Rena for its principal product, the RENA Activation Energy Serum.

18 4. Since defendants launched their bogus “ARëna” products and
19 engaged in their campaign to steal Rena’s business and customers, Rena’s
20 worldwide sales have dropped astronomically – from an average of approximately
21 \$2.5 million a month as of 2010 and early 2011 to less than \$500,000 a month now.
22 By purporting to *be* Rena, defendants have destroyed virtually all of Rena’s U.S.
23 sales and are now cutting substantially into its foreign sales. Unless enjoined,
24 defendants will complete what they set out to achieve – the wholesale theft of
25 Rena’s business.

26 5. On July 4, 2012, Rena was notified by several sales agents in China
27 of overtures received from Lin to sell purported “ARëna” products. It was only then
28 that Rena discovered Lin’s surreptitious effort to steal Rena’s business and clients

1 through their misleading statements to purchasers, and it was only then that Rena
2 discovered the infringing "ARëna" products.

3 6. Plaintiffs seek preliminary and permanent injunctive relief to enjoin
4 and restrain defendants' acts of direct and contributory trademark infringement,
5 copyright infringement, false and deceptive advertising, trade secret
6 misappropriation, trade libel, interference with prospective economic advantage,
7 unfair competition, and invasion of privacy; cancellation of defendant Lin's NEW!
8 ARëNA ACTIVATION ENERGY SERUM trademark; an order transferring
9 ownership of the purported www.RenaSkin.com and www.ArenaSkin.com domain
10 names to Rena; an order impounding the infringing goods; restitution of defendants'
11 illicit gains; damages; and punitive and exemplary relief.

12 **PARTIES**

13 7. Plaintiff Rena is a California corporation having its principal place
14 of business in Los Angeles, California.

15 8. Plaintiff WanZhu Li is an individual who resides in Los Angeles
16 County, California. Li is sometimes known by her Chinese nickname, "WenJia,"
17 and sometimes by her American name, "Kathryn."

18 9. Plaintiff Robert M. Milliken is an individual who resides in Los
19 Angeles County, California. Milliken is the Chief Executive Officer of Rena.

20 10. Defendant Sis-Joyce is a California corporation having its principal
21 place of business in Elk Grove, California. Sis-Joyce is owned, in whole or in part,
22 by defendant Lin.

23 11. Defendant Alice "Annie" Lin is an individual who, upon
24 information and belief, resides in Fremont, California and is an owner of Sis-Joyce.

25 12. Defendant Robert Simone is an individual who, upon information
26 and belief, resides in Los Angeles County, California. Mr. Simone is listed as
27 having registered domain names and obtained hosting services for the
28

1 www.RenaSkin.com and www.ArenaSkin.com websites, which exclusively sell Sis-
2 Joyce-supplied ARëna products.

3 13. Defendant Christine "Nina" Ko is an individual who, upon
4 information and belief, resides in Los Angeles County, California. Upon
5 information and belief, Ko is an agent of Sis-Joyce who shares responsibility for
6 Sis-Joyce's operations.

7 14. Plaintiffs are ignorant of the true names and capacities of the
8 defendants who are named herein under the fictitious names DOES 3-10, inclusive.
9 Plaintiffs will seek leave of the court to amend the complaint to allege their true
10 names and capacities when ascertained. Plaintiffs are informed and believe, and
11 based thereon allege, that each of the fictitiously named DOE defendants is
12 responsible in some manner for the wrongful conduct alleged herein. Plaintiffs
13 further allege that each defendant acted in concert and participation with, as agent of
14 or representative for, at the request of, or on behalf of Sis-Joyce, Lin, Simone,
15 and/or Ko. Each charge and allegation alleged herein is, therefore, also hereby
16 alleged against each fictitiously named DOE defendant.

17 **JURISDICTION AND VENUE**

18 15. This action arises under the Lanham Trademark Act, 15 U.S.C.
19 Sections 1114, 1116, 1117, and 1125(a) and (d); 17 U.S.C. Sections 101, *et seq.*; and
20 18 U.S.C. Section 1964(c). This Court has original subject matter jurisdiction
21 pursuant to 20 U.S.C. Section 1331, *et seq.*; 28 U.S.C. Sections 1331 and 1338;
22 15 U.S.C. Sections 1116 and 1121; and 18 U.S.C. Section 1964(c). This Court has
23 supplemental jurisdiction over plaintiffs' state law claims pursuant to 28 U.S.C.
24 Section 1367.

25 16. Venue lies in this District pursuant to 28 U.S.C. Sections 1391(b)
26 and (c); 28 U.S.C. Section 1400(a); and 18 U.S.C. Section 1965.

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FACTUAL ALLEGATIONS

Rena's Business and Trademarks

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3 17. Rena is an internationally acclaimed manufacturer and distributor of
4 high-end skin care, healthcare, and anti-aging products located in Los Angeles,
5 California. Since June 2006, it has sold its products using its RENA and RENA
6 BIOTECHNOLOGY trademarks. RENA BIOTECHNOLOGY is registered in the
7 United States in International Class 5. Rena was founded and is owned by plaintiff
8 Kathryn Li, who is also the registered owner of its trademarks and who has granted
9 an exclusive license of those trademarks to Rena. Plaintiff Robert Milliken is
10 Rena's Chief Executive Officer.

11 18. Rena manufactures and sells a suite of health-related products,
12 including Activation Energy Serum, Activation Mist, and Activation Energy Elixir.
13 Rena's scientists have extracted nearly 100 minerals and trace elements for use in
14 products designed to help users resist the effects of aging. The Rena products
15 incorporating those natural minerals are absorbed through the skin and can reach a
16 depth of 30 to 50 millimeters. Rena's products are designed to reduce wrinkles,
17 inflammation, and pain while moisturizing skin and promoting skin health.

18 19. To protect its valuable and unique products, Rena has sought U.S.
19 trademark registrations for its marks. It obtained registration of its RENA
20 BIOTECHNOLOGY word mark, No. 3,332,867, in 2007 with a first-use-in-
21 commerce date of February 1, 2007. In April 2012, it applied for registration of a
22 stylized RENA BIOTECHNOLOGY mark, Serial No. 85,587,003, with a first-use-
23 in-commerce date of June 29, 2006. The stylized RENA BIOTECHNOLOGY
24 mark, used on all Rena products since June 2006, is shown below.



1 20. In addition, in April 2012, Rena applied to register various other
2 stylized RENA and RENA BIOTECHNOLOGY marks, using both English letters
3 and Chinese characters, including the stylized RENA mark standing alone. Those
4 applications are currently pending.

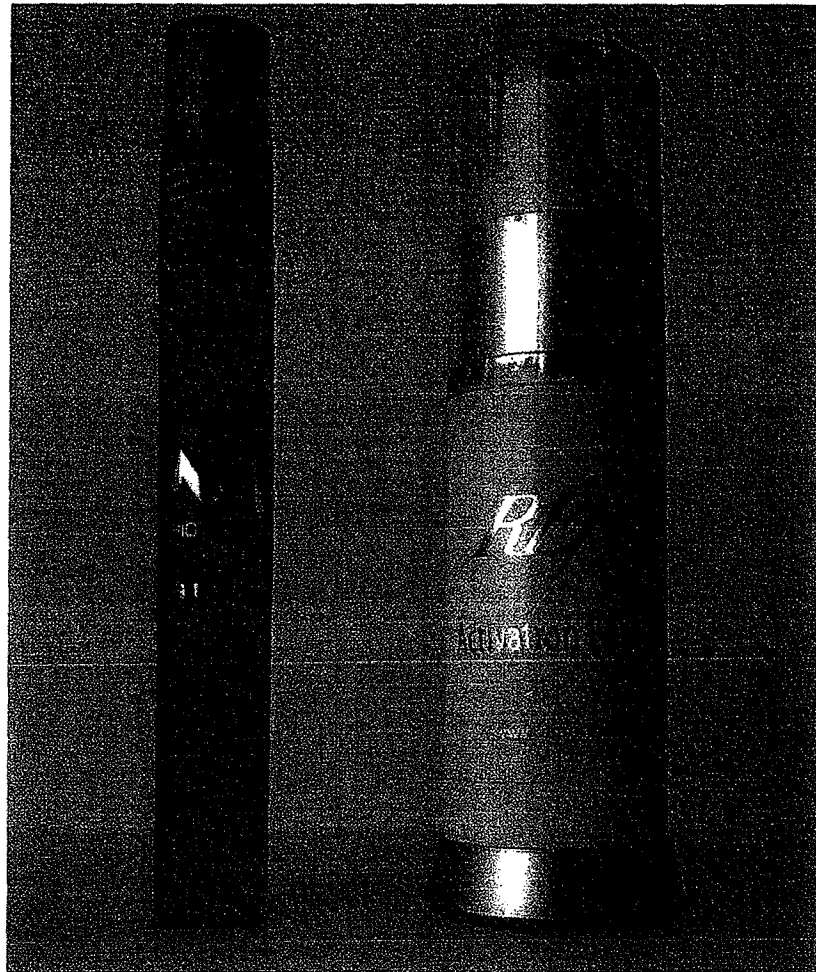
5 21. The authentic products sold by Rena prominently display the RENA
6 and RENA BIOTECHNOLOGY marks, as shown below:



20 **Defendants' Counterfeiting**

21 22. At one time, defendant Lin, Ko and Simone were authorized
22 distributors of RENA products. Yet while they were only authorized to sell genuine
23 RENA products – placing orders that would be fulfilled by Rena itself – defendant
24 Lin in fact started selling adulterated RENA products by applying counterfeited
25 labels that used Rena's protected trademarks to generic spray bottles, which were
26 then filled with diluted RENA products and sold as genuine.

27 23. The photograph below depicts exemplars of two bottles used by Lin
28 to sell her counterfeit RENA products.



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18 24. Upon discovering this counterfeiting in or about October or
19 November 2010, Rena discontinued Lin's supply of RENA products, believing that
20 cutting off Lin's supply of product would force an end to her counterfeiting and
21 infringement.

22 25. But Lin did not abandon these illegal activities. Instead, on
23 information and belief, Lin started selling tap water or contents other than the
24 genuine Rena product, which she passed off as genuine RENA products using their
25 counterfeit labels.

26 **Defendants' Fraudulent Websites and Sales**

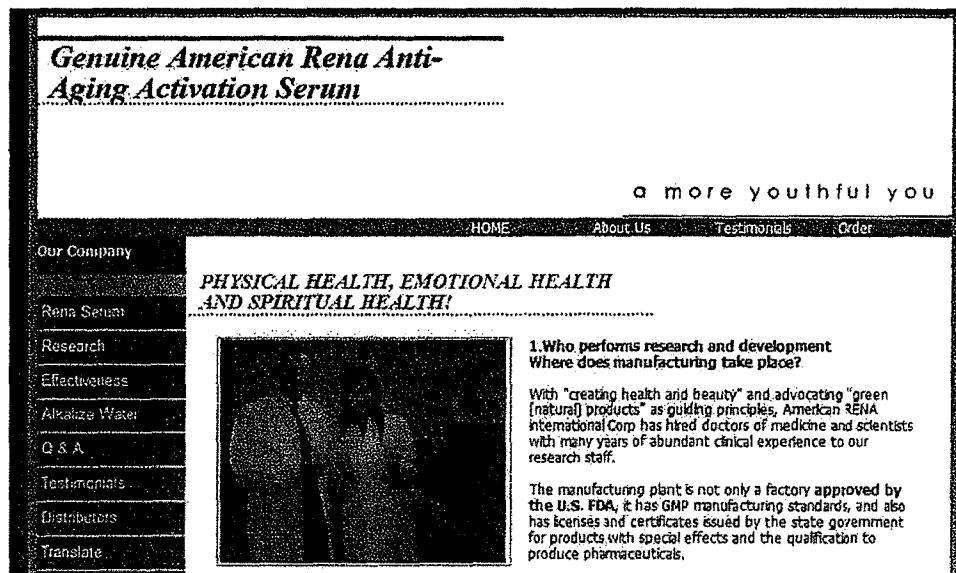
27 26. Starting in or about early 2011, Lin began working with agents
28 and/or distributors, including Simone and Ko, to manufacture and sell so-called

1 “ARēna” products. Like Lin, both Simone and Ko were former members of Rena.
2 To further their plan, Lin, Simone, and Ko communicated through e-mail to plan
3 meetings and distribute materials to promote infringing products. These efforts also
4 included the creation and operation of fraudulent and infringing websites.

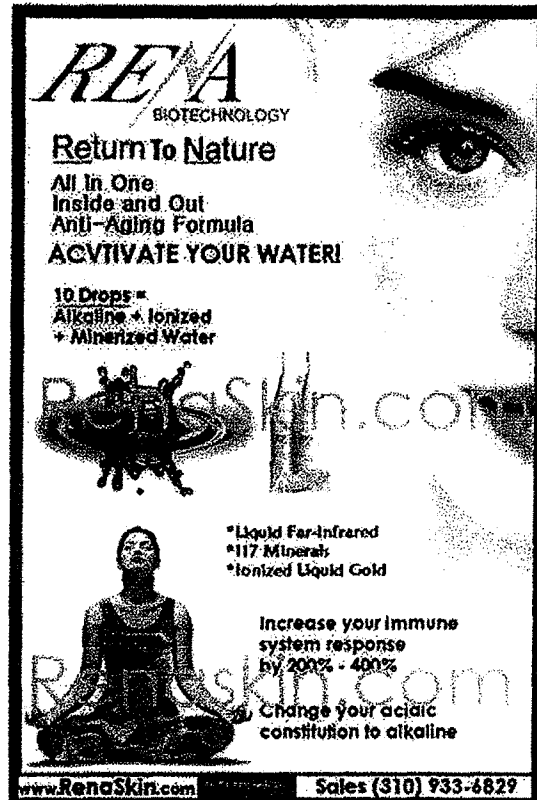
5 27. With the knowledge or constructive knowledge of Lin and Ko,
6 Simone registered the www.RenaSkin.com website through an intermediary or
7 using an assumed name, “Damon Rith,” in an effort to hide his involvement in the
8 site. The “WHO IS” look up reflects that “Damon Rith” is the registrant,
9 administrative contact, and technical contact for RenaSkin.com and that he
10 purportedly resides at “123 Reed Street” in Blue Bell, Pennsylvania 19422 – an
11 address that does not exist. There is also apparently no known record of “Damon
12 Rith” in Pennsylvania. Defendant Simone registered the RenaSkin.com domain
13 name using false contact information in an effort to hide his true identity. On
14 August 14, 2012, defendant Simone purchased private, anonymous domain
15 registration services for Renaskin.com, using the e-mail address
16 renausal@gmail.com.

17 28. The RenaSkin.com website has been carefully crafted to cause
18 maximum confusion with plaintiff Rena’s genuine products and plaintiff’s
19 AmericanRena.com website. Virtually every page of the site has the following
20 header: “*Genuine American Rena Anti-Aging Activation Serum.*” The site
21 declares that “Rena Activation Energy contains innovative materials, processed
22 from natural minerals by an advanced purifying technology.” As shown below, the
23 site displays a photograph of Rena’s founder, Kathryn Li, and its Chief Executive
24 Officer, Robert Milliken, with the caption, “Who performs research and
25 development[?] Where does manufacturing take place?”

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29. The site copies substantially all the designs, graphics, photographs and text of the AmericanRena.com website. The site declares, in the "Q&A" section, that "American RENA external use products ... do not contain alcohol or preservatives" in response to the question, "I've heard that American RENA Activation Spray external spray products are very effective at restoring and preserving skin with pimples or have been damaged as a result of using cosmetics containing lead, mercury, or stimulants - is this true?" Remarkably, the RENA Skin.com website even has a large reprint of RENA's stylized RENA BIOTECHNOLOGY trademark (shown below) and depictions of RENA's products and brochures.



30. The purported RenaSkin.com website copies extensively from Rena's AmericanRena.com website, even to the extent of reproducing a letter authored by Mr. Milliken. The purported RenaSkin.com site includes such headings as "RENA-LIQUID FAR INFRARED = ALKALINE NEGATIVE ION" and "DESCRIPTION OF RENA LIQUID LIFE ACTIVATION ENERGY PRODUCTS," and contains descriptions of "American Rena Activation Serum," among numerous references to "American Rena," "American RENA," and "RENA." It contains a "COMPARISON OF BOTOX VERSUS American RENA," and depicts two pages copied from the American Rena brochure and website. Still further, the stylized RENA BIOTECHNOLOGY trademark appears in conjunction with references to the purported RenaSkin.com website.

31. Products ordered from RenaSkin.com were shipped from an address obtained and used by Simone with the non-existent address information of the

1 "Domain of Melchizedek." The infringing products were packaged with the Sis-
2 Joyce logo and labeled "New! ARëna Activation Energy Serum." Further, the
3 packaging used to ship the infringing products bore a stylized RENA mark and
4 included promotional brochures containing variations of plaintiffs' protected RENA
5 and RENA BIOTECHNOLOGY marks.

6 32. Rena is further informed and believes that with the knowledge or
7 constructive knowledge of Lin and Ko, Simone registered the www.ArenaSkin.com
8 website using an assumed name, "Dave Simms," and the emails
9 renausal@gmail.com and submitmystuff@yahoo.com. The "WHO IS" information
10 provided to the registrar of the ArenaSkin.com domain name reflects that (i) the
11 registrant is "Dave Simms," (ii) the administrative contact is "Dave Ded," (iii) the
12 technical contact is "Dave Sed," (iv) Ded and Sed can be found at "123 Red Road"
13 in Blue Bell, Pennsylvania 19422; and (v) Simms can be found at "124 Red Road"
14 in Blue Bell, Pennsylvania 19422. In fact, there is no "Red Road" in Blue Bell, nor
15 does there appear to be a "David Simms" in that city. Thus, as to the
16 ArenaSkin.com website as well, the registrar was provided with false information to
17 hide the true names and capacities of the registrant, administrative contact, and
18 technical contact.

19 33. The purported ArenaSkin.com site is very similar to the
20 RenaSkin.com site, and is equally infringing of Rena's rights. For example, the
21 header at the top of each page has been modified to proclaim, "***Genuine American***
22 ***aRena Anti-Aging Activation Serum***" - but is accompanied by the explanation that,
23 "**Rena is Now aRena!**" The purported "**aRena**" products are described as having a
24 "**New Improved Formula**" in an effort to persuade consumers that Rena has
25 become "ARëna" when it has not. It, too, copies without authorization a letter
26 authored by Rena's Chief Executive Officer, Robert Milliken, extolling the benefits
27 of genuine Rena products. Further, it has extensively copied graphics and text from
28 Rena's website.

1 34. Records reveal that defendant Simone controlled the payment
2 accounts used to process orders from ArenaSkin.com and RenaSkin.com. Simone
3 used the alias "Rena Corp," login alias "AMERICANRENA," and the e-mail
4 addresses renausa1@gmail.com; robmib@excite.com; and
5 robsimonetalks@yahoo.com, all of which were designed to hide Simone's
6 involvement with the websites.

7 35. With the knowledge or constructive knowledge of Lin and Ko,
8 Simone registered yet another website, www.American-Rena.com, using the alias
9 "Robert Sim." This website displayed "American Rena" on its homepage,
10 advertised "ARena Activation Serum" as "American RENA Activation Serum
11 Spray," and displayed the infringing .51 ounce ARëna bottle beside a paragraph
12 stating that "Rena Activation Energy contains innovative materials, processed from
13 natural minerals by an advanced purifying technology."

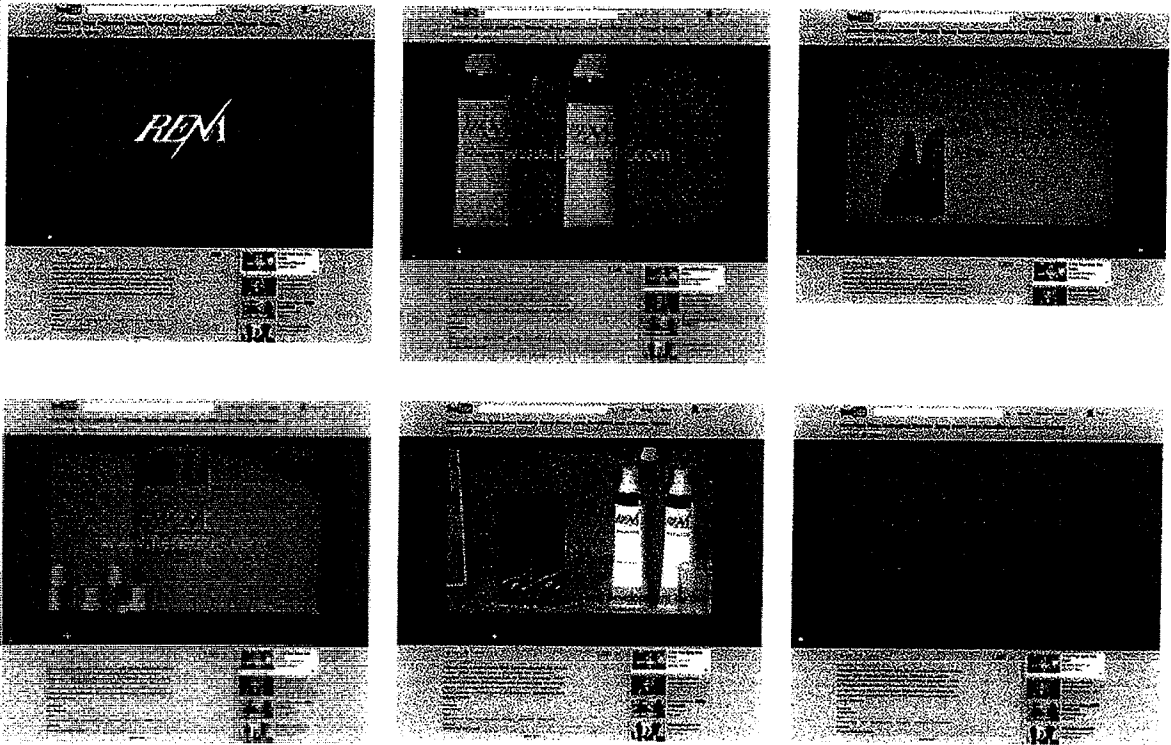
14 36. In addition, many of the images, graphics, and scientific references
15 found on Rena's website (www.AmericanRena.com) also appear on Sis-Joyce's
16 website (www.SisJoyce.com), purportedly registered by a third party but
17 beneficially owned by Lin.

18 **Defendant's Fraudulent Advertisements**

19 37. Defendants have also taken measures to directly trade on the
20 goodwill and popularity of Rena's products in advertisements for their own
21 infringing products. For example, Simone, with the knowledge or constructive
22 knowledge of the other defendants, posted YouTube videos that *appear* to promote
23 genuine RENA products – and display those products, and even Rena's place of
24 business in Los Angeles – but then direct consumers to the bogus RenaSkin.com
25 website that sells defendants' infringing goods. Screen shots of the fraudulent
26 videos posted on YouTube include the following:

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38. Still further, defendants provide fliers and brochures with their products that use many of the same photographs, images and designs as appear in Rena's promotional materials. Indeed, the RenaSkin.com website itself displays *Rena's* promotional brochures in an effort to sell the infringing "ARëna" products, as shown:

RENA Product Effectiveness

Internal Use: Dilute 10 drops of Energy Serum in 3 oz (90 ml) of warm water & take it 30 minutes after a meal, once or twice daily.

- ☐ Increases enzymatic antibody by 2-4 Times
- ☐ Anti-inflammatory
- ☐ Anti-oxidant, anti-bacterial
- ☐ DNA cell activator
- ☐ Decomposes toxins
- ☐ Decomposes fats
- ☐ Decomposes sugar
- ☐ Improves Sleep
- ☐ Acidic to Alkaline Body conversion

External use: Spray it as needed, multiple times daily, on your face and body.

- ☐ Defies Dermatological Aging Process
- ☐ Anti-Wrinkle Anti-Aging
- ☐ Moisturizing
- ☐ Protection Against Ultraviolet Rays
- ☐ Electromagnetic Wave Resistance
- ☐ Static Electricity Prevention
- ☐ Powerful Internal cleanser

Drink & Spray - Rejuvenates All Body Cells
Reported Improvements:

- ✓ Wrinkles, Face Spots, Eye Circles, 99% UV Protection
- ✓ White hair reversal, Dandruff, Headaches
- ✓ Dry eyes, Glaucoma, Cataract, Floaters in the eyes
- ✓ Acne, Pimples, Rosacea, Psoriasis, Alopecia
- ✓ Tooth Ache, Sore Throat, Bad Breath, Herpes
- ✓ Body Firming, Weight Loss (Drink & spray multiple times on navel and abdomen)
- ✓ Hemorrhoids, Spider Veins, Males, Arthritis
- ✓ Autism, Cholesterol, Gout, Stroke, Diabetes, High Blood Pressure, Arthritis and many others

Note: Depending on each person's body-condition, the rate of improvements may vary from person to person.

RENA - A WRINKLE-FREE World

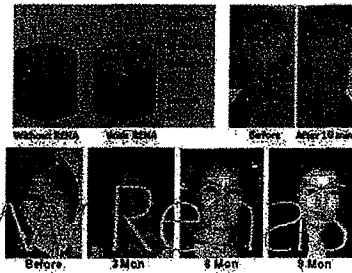
* Face Lift in Minutes *

The American RENA Activation Energy Spray, leveraging the liquid far-infrared, penetrates 3-5 cm under your skin to the dermal layer and beyond, delivering the natural minerals our cells desperately need. Our Ionized GOLD will re-energize your skin's damaged collagen tissue and will rejuvenate all your body cells. In just a few minutes your face is lifted, rejuvenated and wrinkles reduced magically.

Compared to Botox, the RENA liquid face lift is painless, drinkable, cost effective and natural. Best of all, besides younger and prettier face, RENA will beautify you from the inside out in a RE-juvenal way.

Botox versus RENA

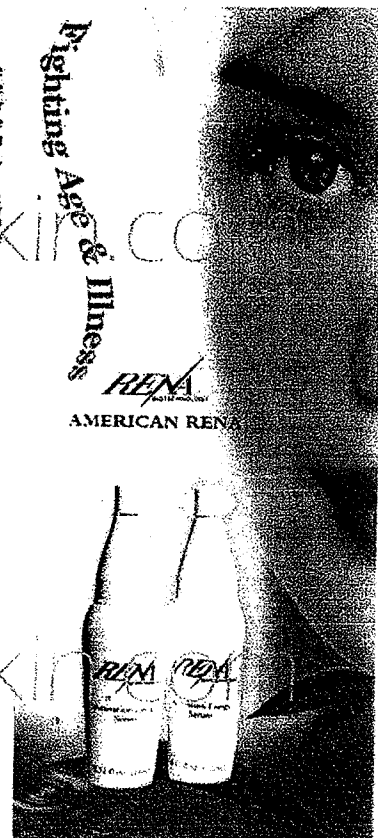
#	Category	Botox	RENA
1	Reduces wrinkles & face lines	Yes	Yes
2	Rejuvenates the skin	No	Yes
3	Maximizes firmness and elasticity	No	Yes
4	Mineralizes and hydrates	No	Yes
5	Refines skin complexion	No	Yes
6	Non-Surgical	No	Yes
7	Non-Invasive treatments	No	Yes
8	Non-Surgical treatments	No	Yes
9	Non-Toxic to the nervous system	No	Yes



For orders and information please contact:

American RENA USL INC.

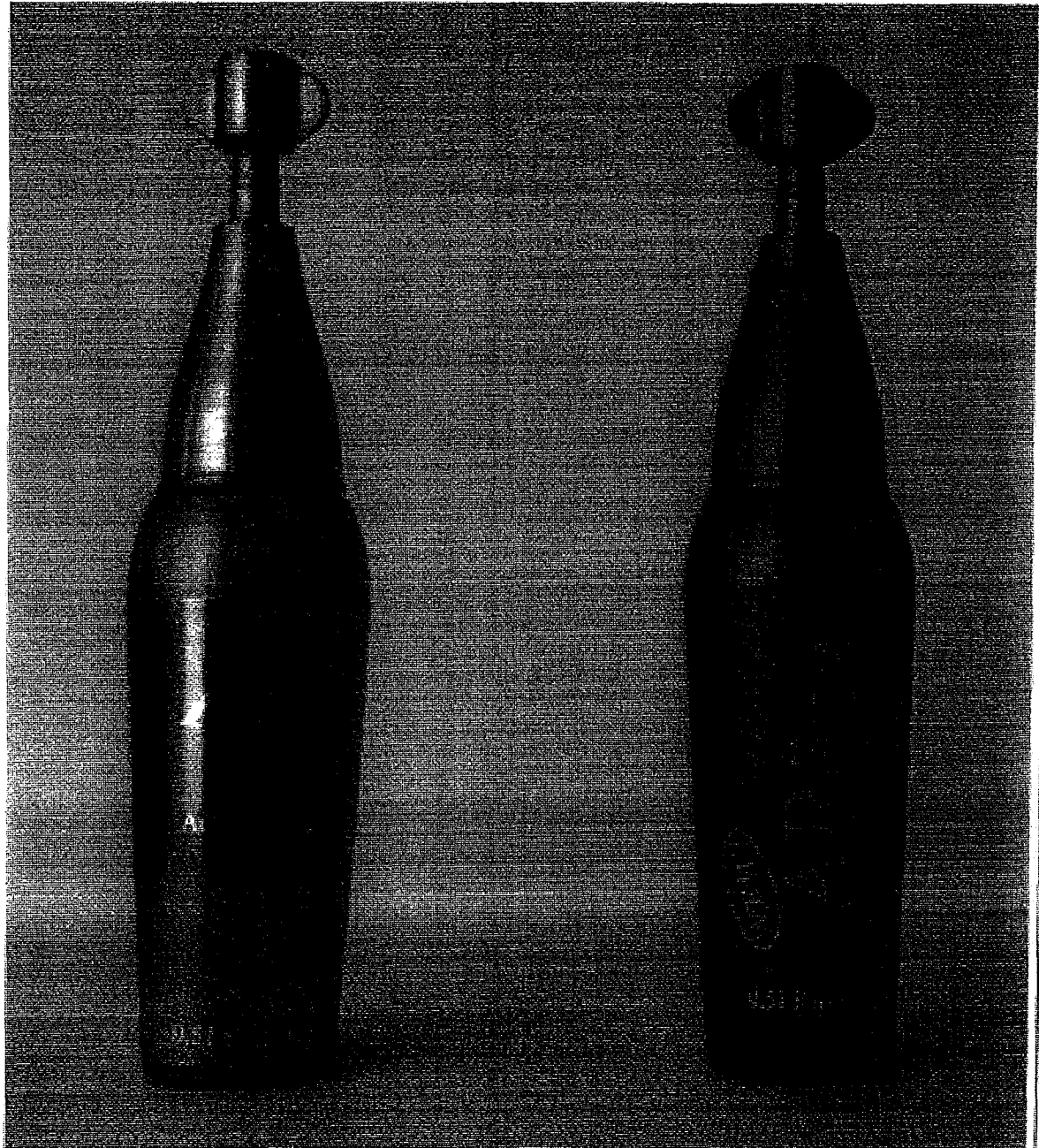
www.RenaSkin.com
(310) 933-6829

**Defendants' Infringing Trade Dress**

39. Not satisfied with merely using and infringing upon RENA's trademarks and copyrights, have also sold their knock-off "ARëna Activation Energy Serum" product in a manner that infringes RENA's trade dress. RENA sells its RENA Activation Energy Serum product in a distinctive, specially designed .51 fluid ounce bottle that is typically lavender in color. The engineering drawings of RENA's distinctive .51 fluid ounce Activation Energy Serum bottle are reproduced below.



-15-



Defendants' Infringing Mark

41. Defendant Sis-Joyce obtained a registration of "Sis-Joyce" from the United States Patent and Trademark Office in International Class 3 on July 26, 2011 (identifying the registrant as defendant Lin). Nevertheless, defendants have chosen to trade on and exploit the extremely valuable goodwill that Rena has developed in

1 its RENA and RENA BIOTECHNOLOGY marks with the intent to arrogate that
2 goodwill to itself. In furtherance of that objective, defendants have obtained a
3 federal registration of a NEW! ARëna ACTIVATION ENERGY SERUM mark,
4 as shown below:



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10 42. Defendants have engaged in a coordinated effort to both directly
11 counterfeit genuine RENA products and also pass their products off as “new Rëna”
12 products. Defendants Sis-Joyce, its owner, Lin, and its distributors Simone and Ko
13 have aggressively marketed and sold purported “ARëna Activation Energy Serum”
14 products, often without making mention of Sis-Joyce and always in a manner
15 designed to cause confusion with genuine RENA products.

16 **Defendants’ Interference With Rëna’s Business Relationships**

17 43. Rëna’s sales numbers dramatically reveal the effect of Defendants’
18 unfair competition and fraudulent activities. During calendar year 2009, Rëna’s
19 sales totaled just under \$17 million. During calendar year 2010, Rëna’s total sales
20 were approximately \$30 million and Rëna’s revenues easily exceeded \$1 million
21 during each month of the year. In August 2011, Rëna did approximately \$2.2
22 million in business, but that was the last time it achieved seven-figure sales. Since
23 then, its monthly sales have steadily declined, dropping to just \$271,000 in June of
24 2012. Absent immediate relief, Rëna, which less than one year ago had a very
25 successful and growing export business, will be out of business altogether.
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27
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FIRST CLAIM FOR RELIEF

(Direct and Contributory Statutory Trademark Infringement by Rena and Kathryn Li
against all Defendants)
(15 U.S.C. § 1114)

44. Plaintiffs Rena and Kathryn Li incorporate and re-allege
paragraphs 1-43 of this Complaint.

45. Kathryn Li owns, and Rena has the exclusive right to use, the
federally registered RENA BIOTECHNOLOGY trademark in connection with
Rena's products. The RENA BIOTECHNOLOGY trademark is highly distinctive
and fanciful, and has earned a strong secondary meaning within the organic, natural
anti-aging products market.

46. Defendants' use of their purported "ARëna," "aRena," and
"aRENA" marks on directly competing products has infringed, and is infringing, the
RENA BIOTECHNOLOGY trademark.

47. Likewise, Defendants' sales of products using the RENA
BIOTECHNOLOGY mark and uses of the RENA BIOTECHNOLOGY mark to
promote sales of their "ARëna," "aRena," and "aRENA" products has infringed, and
is infringing, the RENA BIOTECHNOLOGY trademark.

48. Defendants' use of their infringing marks is likely to cause
confusion, cause mistake, or deceive consumers as to the affiliation, connection or
association of defendants and their products with those of Rena, and is likely to
cause confusion, cause mistake, or deceive consumers as to the origin, sponsorship,
or approval by Rena of defendants' products. Such likelihood of confusion is
magnified by defendants' intentional use of deceptively similar product packaging,
deceptively similar websites, and deceptively similar domain names intended to
cause confusion with Rena's products, as well as by frequent advertising references
to "American Rena" intended to cause confusion with Rena's

1 www.AmericanRena.com website, and by infringements of Rena's product
2 brochures, flyers, and website.

3 49. Defendants' use of their infringing variations of the purported
4 "ARëna" mark enables defendants to benefit unfairly from Rena's reputation and
5 success, thus giving defendants' infringing products sales and commercial value
6 they would not otherwise have.

7 50. Prior to defendants' first use of their infringing marks, defendants
8 were aware of Rena's business and, indeed, defendants Lin, Simone, and Ko had
9 served as distributors of Rena's products. Further, defendants had actual notice and
10 knowledge, or constructive notice, of plaintiffs' registered trademarks.

11 51. Defendants Lin, Sis-Joyce, and Ko are also liable for contributory
12 trademark infringement as suppliers of infringing goods to defendant Simone. Lin,
13 Sis-Joyce, and Ko have supplied infringing "ARëna" products to defendant Simone
14 even after they knew, or had reason to know, that defendant Simone was infringing
15 plaintiffs' RENA BIOTECHNOLOGY mark, as described herein. Defendants Lin,
16 Sis-Joyce, and Ko had knowledge or constructive knowledge of Simone's infringing
17 actions based on their management and control over the distribution and promotion
18 of the infringing "ARëna" products, as well as Simone's status as an active Sis-
19 Joyce member. Simone's acts of infringement, as alleged herein, include but are not
20 limited to: his operation of websites and posting of Youtube videos that have
21 infringed, and are infringing, the RENA BIOTECHNOLOGY trademark; his use of
22 the "ARëna," "aRena," and "aRENA" marks on directly competing products; and
23 his sales of products using the RENA BIOTECHNOLOGY mark.

24 52. Defendants' direct and contributory infringement of the registered
25 trademark as described herein has been and continues to be intentional, willful and
26 without regard to the rights of Rena and Kathryn Li.

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28

1 53. Rena and Kathryn Li are informed and believe, and on that basis
2 allege, that defendants have gained profits by virtue of their direct and contributory
3 infringement of the RENA BIOTECHNOLOGY trademark.

4 54. Plaintiffs will suffer, and are suffering, irreparable harm from
5 defendants' direct and contributory infringement of their registered trademarks
6 insofar as their invaluable goodwill is being misappropriated by defendants'
7 continuing infringement. Plaintiffs Rena and Kathryn Li have no adequate remedy
8 at law to compensate them for the loss of business reputation, customers, market
9 position, and goodwill and confusion of potential customers flowing from
10 defendants' infringing activities. Pursuant to 15 U.S.C. § 1116, plaintiffs Rena and
11 Kathryn Li are entitled to preliminary and permanent injunctive relief against
12 defendants' continuing infringement of their registered trademark. Unless enjoined,
13 defendants will continue their infringing conduct.

14 55. Because defendants' actions have been committed with the intent to
15 damage Rena and Kathryn Li and to confuse and deceive the public, Rena and
16 Kathryn Li are entitled to recover defendants' profits, treble their actual damages, an
17 award of costs, and, this being an exceptional case, reasonable attorneys' fees
18 pursuant to 15 U.S.C. § 1117(a).

19 **SECOND CLAIM FOR RELIEF**

20 (Direct and Contributory Common Law Trademark Infringement by Rena and
21 Kathryn Li
22 against all Defendants)

23 56. Plaintiffs Rena and Kathryn Li incorporate and re-allege
24 paragraphs 1-55 of this Complaint.

25 57. Beginning in 2006 and continuously thereafter, plaintiffs have made
26 commercial use of their RENA word and design marks in interstate commerce in
27 connection with the manufacture and sale of their skin care, health care, and anti-
28

1 aging products as alleged herein, including their Activation Energy Serum,
2 Activation Mist, and Activation Energy Elixir products.

3 58. Within the market for organic, natural, ingestible anti-aging skin-
4 care products, the RENA word and design marks have developed exceptionally
5 strong goodwill and an exceptionally strong secondary meaning as identifying
6 Rena's products and/or as coming from a single source. For that reason, defendants
7 have falsely misrepresented to the trade and consuming public that they either
8 acquired Rena or bought formula of RENA product or somehow evolved from it.

9 59. Prior to defendants' first use of their infringing marks, defendants
10 were aware of plaintiffs' business and had actual notice of plaintiffs' trademarks.

11 60. Defendants' use of the purported "ARëna," "aRena," "aRENA," and
12 "NEW! ARëNA ACTIVATION ENERGY SERUM" marks, as well as their use of
13 the RENA mark itself, is likely to cause, and already has caused, confusion and
14 mistake, and is likely to, and has deceived Rena's sales representatives and the
15 consuming public as to the affiliation, connection, or association of defendants with
16 plaintiffs, or as to the origin, sponsorship, or approval by plaintiffs of defendants'
17 goods, services and commercial activities.

18 61. Defendants Lin, Sis-Joyce, and Ko are also liable for contributory
19 common law trademark infringement as suppliers of infringing goods to Simone.
20 Lin, Sis-Joyce, and Ko have supplied infringing "ARëna" products to defendant
21 Simone even after they knew, or had reason to know, that defendant Simone was
22 infringing plaintiffs' RENA BIOTECHNOLOGY mark. Defendants Lin, Sis-Joyce,
23 and Ko had knowledge or constructive knowledge of Simone's infringing actions
24 based on their management and control over the distribution and promotion of the
25 infringing "ARëna" products, as well as Simone's status as an active Sis-Joyce
26 member. As alleged herein, Simone's use of the purported "ARëna," "aRena,"
27 "aRENA," and "NEW! ARëNA ACTIVATION ENERGY SERUM" marks, as well
28 as his use of the RENA mark itself, is likely to cause, and already has caused,

1 confusion and mistake, and is likely to, and has deceived Rena's sales
2 representatives and the consuming public as to the affiliation, connection, or
3 association of defendants with plaintiffs, or as to the origin, sponsorship, or approval
4 by plaintiffs of the infringing goods, services and commercial activities.

5 62. Defendants' direct and contributory infringement of plaintiffs'
6 marks has enabled them to benefit unfairly from plaintiffs' reputation and success,
7 thereby giving defendants' business a market share and/or commercial value that
8 they would not otherwise enjoy.

9 63. Defendants' direct and contributory infringement of plaintiffs'
10 trademarks as described herein has been and continues to be intentional, willful, and
11 without regard for plaintiffs' rights. Plaintiffs have sustained damages as a direct
12 and proximate result of defendants' infringement of plaintiffs' trademarks as alleged
13 herein.

14 64. Plaintiffs will suffer and are suffering irreparable harm from
15 defendants' direct and contributory infringement of the RENA mark insofar as
16 plaintiffs' invaluable good will and market share is being eroded by defendants'
17 continuing infringement. Plaintiffs have no adequate remedy at law to compensate
18 them for the loss of business reputation, market share, sales representatives,
19 customers, good will, and confusion of potential customers flowing from
20 defendants' direct and contributory infringing activities. Plaintiffs are entitled to a
21 preliminary and permanent injunction against defendants' continuing infringement
22 of plaintiffs' RENA trademark. Unless enjoined, defendants will continue their
23 infringing conduct.

24 **THIRD CLAIM FOR RELIEF**

25 (Trademark Cancellation by Rena and Kathryn Li against Lin)

26 (15 U.S.C. § 1064)

27 65. Plaintiffs Rena and Kathryn Li incorporate and re-allege
28 paragraphs 1-64 of this Complaint.

1 66. Kathryn Li is the owner, and Rena the exclusive licensee, of the
2 federally registered RENA BIOTECHNOLOGY trademark. In addition, they are
3 the owner and licensee, respectively, of the RENA mark which, like RENA
4 BIOTECHNOLOGY, is highly distinctive and fanciful, and enjoys a strong
5 secondary meaning within the organic, natural anti-aging ingestible products
6 market.

7 67. On July 26, 2011, defendant Lin obtained registration of a
8 purported, "NEW! ARĚNA ACTIVATION ENERGY SERUM" mark (the
9 "Infringing Mark") pursuant to Certificate of Registration No. 4,002,069 as a word
10 and design mark for use with "body and beauty care cosmetics."

11 68. The Infringing Mark is being used by defendants to misrepresent the
12 source of the goods defendants sell in connection with the use of that mark.

13 69. Plaintiffs Rena and Kathryn Li are, accordingly, entitled to an order
14 directing that the Infringing Mark be, and hereby is, canceled.

15 **FOURTH CLAIM FOR RELIEF**

16 (Direct and Contributory Lanham Act Section 43(a) violation by Rena and Kathryn
17 Li against all Defendants)

18 (15 U.S.C. § 1125(a))

19 70. Plaintiffs Rena and Kathryn Li incorporate and re-allege
20 paragraphs 1-69 of this Complaint.

21 71. Defendants' misconduct as alleged herein is likely to cause, and is
22 causing, confusion between defendants' products and Rena's products in that
23 consumers are likely to, and do, confuse defendants' products as originating or
24 affiliated with Rena, including in that defendants have used and are using (i) the
25 purported ARĚna, aRena, aRENA and NEW! ARENA ACTIVATION ENERGY
26 SERUM marks; (ii) Rena's RENA and RENA BIOTECHNOLOGY marks;
27 (iii) references to the "new Rena"; (iv) photographs of Rena's owner and Chief
28 Executive Officer; (v) a letter authored by Rena's president; (vi) brochures, fliers

1 and websites that heavily copy the look and feel, photographs, illustrations, and
2 textual material from Rena's brochures, fliers and website; (vii) virtually identical
3 product bottles copied from Rena; and (viii) websites that substantially copy the
4 content of Rena's official website.

5 72. Defendants have deliberately adopted, imitated and mimicked the
6 trade dress and trademarks of plaintiff's products, packaging and advertising.
7 Defendants' actions have been, and are being, undertaken with the intent to deceive
8 consumers, cause confusion and mistake, and interfere with the ability of consumers
9 to identify the source of goods by trademark, appearance and packaging. Through
10 their conduct, defendants unlawfully exploit the goodwill and reputation that
11 plaintiffs Rena and Kathryn Li have developed in their marks and business and
12 defendants are unlawfully deriving benefit therefrom.

13 73. Defendants' acts alleged herein are without the consent of plaintiffs
14 Rena and Kathryn Li and constitute the use of terms, symbols, devices or
15 combinations thereof that are false or misleading within the meaning of 15 U.S.C.
16 § 1125 and are likely to cause confusion, or to cause mistake, or to deceive as to the
17 affiliation, connection, or association, or as to the origin, sponsorship, or approval,
18 of defendants' goods by Rena and/or Kathryn Li within the meaning of 15 U.S.C.
19 § 1125. Defendants' actions discussed and alleged herein also constitute unfair
20 competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).
21 Plaintiffs have been, and are being, damaged by defendants' acts.

22 74. Defendants' conduct has been intentional and willful, and is
23 specifically calculated to trade on the goodwill that plaintiffs Rena and Kathryn Li
24 have developed in their successful RENA BIOTECHNOLOGY products. By the
25 aforesaid acts, including without limitation the deliberate use of Rena's unique and
26 distinctive bottle trade dress, repeated references to "Rena" products, and use of
27 written and photographic elements portraying Rena's owner and Chief Executive
28 Officer in connection with goods sold and distributed in interstate commerce,

1 defendants have infringed, and are likely to continue to infringe, plaintiffs' rights in
2 their RENA and RENA BIOTECHNOLOGY products.

3 75. Defendants Lin, Sis-Joyce, and Ko are also liable for contributory
4 trademark infringement as suppliers of infringing goods to defendant Simone. Lin,
5 Sis-Joyce, and Ko have supplied infringing "ARëna" products to defendant Simone
6 even after they knew, or had reason to know, that defendant Simone was infringing
7 plaintiffs' trademarks and trade dress. Defendants Lin, Sis-Joyce, and Ko had
8 knowledge or constructive knowledge of Simone's infringing actions, as alleged
9 herein, based on their management and control over the distribution and promotion
10 of the infringing "ARëna" products, as well as Simone's status as an active Sis-
11 Joyce member.

12 76. Lin, Sis-Joyce, and Ko acted intentionally and willfully in providing
13 products to Simone for use in his infringing acts. These acts included, without
14 limitation, the deliberate use of Rena's unique and distinctive bottle trade dress,
15 repeated references to "Rena" products, and use of written and photographic
16 elements portraying Rena's owner and Chief Executive Officer in connection with
17 goods sold and distributed in interstate commerce. Each such act infringed
18 plaintiffs' rights in their RENA and RENA BIOTECHNOLOGY products.

19 77. Plaintiffs Rena and Kathryn Li have been damaged by, and
20 defendants have profited from, defendants' wrongful conduct in an amount to be
21 proven at trial.

22 78. For each act of direct and contributory infringement, plaintiffs Rena
23 and Kathryn Li are entitled to recover their actual damages as well as defendants'
24 profits from such infringement.

25 79. Plaintiffs are suffering and will suffer irreparable harm from
26 defendants' direct and contributory acts of false designation of origin or affiliation.
27 Plaintiffs also have been, and will continue to be, irreparably harmed and damaged
28 by defendants' conduct in that their invaluable goodwill is being eroded by

1 defendants' continuing acts of infringement. Plaintiffs have no adequate remedy at
2 law to compensate them for the loss of business reputation, customers, market
3 position, goodwill, and confusion of potential customers flowing from defendants'
4 unlawful activities. Plaintiffs are therefore entitled to preliminary and permanent
5 injunctive relief to stop defendants' continuing acts of false designation of origin or
6 affiliation and continued infringement of the Activation Energy Serum bottle trade
7 dress, product brochures, product fliers, website, and trademarks.

8 80. Because defendants' actions have been committed with the intent to
9 damage plaintiffs Rena and Kathryn Li and to confuse and deceive the public,
10 plaintiffs are entitled to recover treble or actual damages, and award of costs, and,
11 this being an exceptional case, reasonable attorneys' fees pursuant to 15 U.S.C.
12 § 1117(a).

13 **FIFTH CLAIM FOR RELIEF**

14 (Copyright Infringement by Rena against all Defendants)

15 81. Rena incorporates and re-alleges paragraphs 1-80 of this Complaint.

16 82. Rena is the owner of valid copyrights in works that are fixed in
17 tangible media of expression, including in its website. These copyrights include,
18 without limitation, those that are the subject of registration numbers TXu 1-815-587
19 and TXu 1-815-464.

20 83. Defendants Sis-Joyce, Lin, Simone, Ko, and DOES 3-10 have
21 reproduced, created derivative works from and otherwise infringed upon Rena's
22 exclusive rights in its protected works without Rena's authorization. Defendants'
23 acts violate Rena's exclusive rights under the Copyright Act, including without
24 limitation Rena's exclusive rights to reproduce its copyrighted works and to create
25 derivative works from its copyrighted works, as set forth in 17 U.S.C. §§ 106 and
26 501.

27 84. Defendants' infringement (and substantial contributions to the
28 infringement) of Rena's copyrighted works is and has been knowingly made without

1 Rena's consent and for commercial purposes and the direct financial benefit of
2 defendants. On information and belief, defendants also have deliberately failed to
3 exercise their right and ability to supervise the infringing activities of others within
4 their control to refrain from infringing Rena's copyrighted works and have failed to
5 do so in order to deliberately further their significant financial interest in the
6 infringement of Rena's copyrighted works. Accordingly, defendants have engaged
7 in direct, contributory and vicarious infringement of Rena's copyrighted works.

8 85. Defendants' infringement of Rena's copyrighted works has been
9 willful and intentional, engaged in with no regard for Rena's lawful rights.

10 86. By virtue of defendants' infringing acts, Rena is entitled to recover
11 its actual damages plus defendants' profits, its costs of suit and attorneys' fees,
12 statutory damages, punitive damages, and all other relief permitted under the
13 Copyright Act.

14 87. Defendants' actions have caused and will continue to cause
15 irreparable damage to Rena, for which Rena has no remedy at law. Unless
16 defendants are restrained from continuing their infringement of Rena's copyrights,
17 these injuries will continue to occur in the future. Accordingly, Rena is entitled to
18 preliminary and permanent injunctive relief restraining defendants from further
19 infringement.

20 **SIXTH CLAIM FOR RELIEF**

21 (Anticybersquatting Consumer Protection Act Violation by Rena and Kathryn Li
22 against all Defendants)
23 (15 U.S.C. § 1125(d))

24 88. Rena and Kathryn Li incorporate and re-allege paragraphs 1-87 of
25 this Complaint.

26 89. Kathryn Li's and Rena's RENA and RENA BIOTECHNOLOGY
27 marks were distinctive when Defendants registered their www.RenaSkin.com and
28 www.ArenaSkin.com domain names (the "Cyberpirated Domain Names").

1 90. The Cyberpirated Domain Names are confusingly similar to Rena's
2 and Kathryn Li's RENA and RENA BIOTECHNOLOGY trademarks used for
3 skincare products.

4 91. Defendants registered their domain names in a bad faith attempt to
5 profit from the RENA and RENA BIOTECHNOLOGY marks, as evidenced by
6 (i) defendants' deliberate attempt to create confusion with Rena's products through
7 defendants' deliberate references to "American Rena" calculated to cause confusion
8 among Internet users familiar with Rena's www.AmericanRena.com website;
9 (ii) the fact that defendants' domain names do not consist of defendants' legal
10 names or names by which they are otherwise commonly identified; (iii) defendants'
11 lack of any prior use of their domain names in connection with a bona fide offering
12 of any goods or services; (iv) defendants' lack of any bona fide noncommercial or
13 fair use of the RENA or RENA BIOTECHNOLOGY marks in a site accessible
14 under their domain names; (v) defendants' intent to divert consumers from Rena's
15 online location to sites accessible under their domain names that can harm, and are
16 harming, the goodwill represented by the RENA and RENA BIOTECHNOLOGY
17 marks for commercial gain by creating a likelihood of confusion as to the source,
18 sponsorship, affiliation, or endorsement of defendants' sites; and (vi) defendants'
19 provision of material and misleading false contact information when applying to
20 register their domain names and their intentional failure to maintain accurate contact
21 information.

22 92. Defendants had and have no reasonable grounds to believe that their
23 uses of the Cyberpirated Domain Names are fair uses or otherwise lawful.

24 93. Rena and Kathryn Li are therefore entitled to the entry of an order
25 of forfeiture or cancellation of the Cyberpirated Domain Names or requiring the
26 transfer of the domain names to Kathryn Li.

27 94. Pursuant to Section 35 of the Lanham Act, 15 U.S.C. § 1117,
28 plaintiffs Rena and Kathryn Li are entitled to an award of statutory damages of

1 \$100,000 against Lin, Simone, or Ko, or, in the alternative, to recover defendants'
2 profits, all damages sustained by Rena and Kathryn Li, and costs of the action and,
3 this being an exceptional case, reasonable attorneys' fees.

4 **SEVENTH CLAIM FOR RELIEF**

5 (Trade Secret Misappropriation by Rena against all Defendants)

6 95. Rena incorporates and re-alleges Paragraphs 1-94 of this Complaint.

7 96. Prior to defendants' unlawful acts complained of herein, Rena had a
8 multi-tiered sales organization comprising nearly 100,000 independent sales agents
9 worldwide. The structure of Rena's sales force can be roughly analogized to that of
10 an army in which a large number of privates report to a somewhat smaller number
11 of sergeants who report to a somewhat smaller number of lieutenants who report to a
12 somewhat smaller number of captains who report to fewer colonels who, in turn,
13 report to still fewer generals. In such a structure, higher ranking officers exercise
14 control, either directly or indirectly, of more persons than are controlled by lower
15 ranking officers. Similarly, in a multi-tiered sales force, persons in the higher tiers
16 have control of more sales personnel than persons in lower tiers enjoy.

17 97. For this reason, the identities and locations of Rena's sales
18 representatives within its multi-level sales structure is a closely-guarded trade secret.
19 The identities of the persons in the upper levels of Rena's sales structure and
20 knowledge of the identities of the sales persons subordinate to each of them would
21 obviously be extremely valuable to any person or entity seeking to compete in the
22 marketplace with Rena. For that reason, Rena has always exercised reasonable
23 efforts to protect the secrecy of the identities of the persons in its sales structure and,
24 until recently, that information had never been known or available to any competitor
25 of Rena or to any person or entity that could derive financial benefit from its
26 disclosure or use.

27 98. As persons who enjoyed positions of trust and confidence within
28 Rena's sales force, defendants Lin, Simone, and Ko understood that such

1 information was highly confidential and trade secret and was disclosed to them
2 under circumstances giving rise to a duty to maintain the secrecy, and limit the use,
3 of such information.

4 99. In derogation of their obligation to maintain the secrecy of Rena's
5 100,000-person sales organization, Lin, Simone, and Ko have, instead, used and are
6 using such information for the benefit of Sis-Joyce and have now poached a very
7 substantial portion of Rena's sales force. Accordingly, Rena is entitled to the entry
8 of an injunction prohibiting further use of its trade secrets; a preliminary and
9 permanent injunction prohibiting Sis-Joyce, Lin, Simone, and Ko from continuing to
10 benefit from their misappropriation of Rena's trade secrets; an award of Rena's
11 actual loss caused by the misappropriation; an award of defendants' unjust
12 enrichment caused by the misappropriation and not taken into account in computing
13 the damages for actual loss; an award of exemplary damages based on defendants'
14 willful and malicious misappropriation of Rena's trade secrets; and an award of
15 reasonable attorneys' fees and costs.

16 **EIGHTH CLAIM FOR RELIEF**

17 (Interference with Prospective Economic Advantage by Rena
18 against all Defendants)

19 100. Rena incorporates and re-alleges Paragraphs 1-97 of this Complaint.

20 101. Rena's economic relationships with its 100,000-member sales force
21 provided prospective economic benefits for Rena.

22 102. Defendants knew and should have known of Rena's economic
23 relationships with its sales representatives and that those economic relationships
24 provided prospective economic benefits for Rena.

25 103. Defendants committed intentional acts that were designed, and
26 which they knew and should have known were substantially likely, to result in a
27 disruption of Rena's business and to impose a burden upon Rena's economic
28 relationships with its sales representatives. Those actions were independently

1 wrongful and included, without limitation, the use of false representations that Rena
2 had been acquired by Sis-Joyce and/or "ARëna;" false representations that Rena had
3 become "ARëna;" and the use of Rena's highly confidential and trade secret
4 information concerning the identities and levels of the persons in its 100,000-person,
5 multi-level sales force.

6 104. But for the conduct of defendants, Rena's economic relationships
7 with its sales force would have resulted in economic benefits to Rena.

8 105. As a result of the aforementioned conduct, Rena suffered damages
9 in an amount to be proved at trial, but which include the loss of customers, sales
10 representatives, sales, good will, and valuable proprietary and trade secret
11 information. Moreover, Defendants' misconduct will continue unabated barring
12 relief, and Rena is therefore entitled to preliminary and permanent injunctive relief
13 to prevent further such misconduct.

14 106. The aforementioned conduct was despicable, wanton, oppressive,
15 malicious, duplicitous, and performed with willful and conscious disregard of
16 Rena's rights and with the intent to deprive Rena of those rights. Accordingly, Rena
17 is entitled to an award of punitive and exemplary damages.

18 **NINTH CLAIM FOR RELIEF**

19 (Trade Libel by Rena against all Defendants)

20 107. Plaintiff Rena incorporates and re-alleges Paragraphs 1-106 of this
21 Complaint.

22 108. Defendants have each individually and in combination made
23 statements concerning Rena's ownership, existence, corporate name, trademarks,
24 products and customers that were false, inaccurate, misleading, deceptive and
25 untrue.

26 109. Defendants knew that such statements were false, inaccurate,
27 misleading, deceptive and untrue and knew and acted with reckless disregard of the
28 truth of those statements, both at the times the statements were made and thereafter.

1 110. As a direct and proximate result of such statements, Rena's
2 customers, sales representatives, and accounts had been induced to cease, reduce, or
3 diminish their business relationships, dealings, and orders placed with Rena.

4 111. As a result of the aforementioned conduct, Rena has suffered
5 damages in an amount which has not yet been ascertained but which includes the
6 loss of Rena's customers, sales representatives, sales, and good will.

7 112. The aforementioned conduct was despicable, wanton, oppressive,
8 malicious, duplicitous, and performed with willful and conscious disregard of
9 Rena's rights and with the intent to deprive Rena of its rights. Accordingly, Rena is
10 entitled to an award of punitive and exemplary damages.

11 **TENTH CLAIM FOR RELIEF**

12 (False Light Invasion of Privacy by Kathryn Li and Robert Milliken
13 against all Defendants)

14 113. Plaintiffs Kathryn Li and Robert Milliken incorporate and re-allege
15 paragraphs 1-112 of this Complaint.

16 114. Defendants' use of photographs of plaintiffs Kathryn Li and Robert
17 Milliken, as well as the use of the letter signed by Mr. Milliken, on websites
18 advertising and promoting defendants' purported "ARëna" products constitutes a
19 calculated falsehood intended to deceive persons viewing the websites into believing
20 that plaintiffs have somehow sponsored, endorsed, produced, or approved
21 defendants' products.

22 115. In appropriating plaintiffs' likenesses, correspondence, and names,
23 defendants have acted with actual malice in falsely portraying plaintiffs as having
24 created or approved defendants' products when, in fact, the opposite is true.
25 Defendants' misappropriation of plaintiffs' images, names, and letter was done
26 maliciously as part of a calculated scheme to misappropriate plaintiffs' business by
27 confusing and misleading plaintiffs' sales leaders, sales representatives, customers,
28 and consumers of natural, organic topical and ingestible skin care products.

1 116. The above invasion of plaintiffs' privacy was wrongful and has
2 caused both humiliation and financial harm to plaintiffs.

3 117. The acts alleged above were performed without plaintiffs' consent
4 and resulted in damage to plaintiffs in an amount to be proved at trial. Plaintiffs are
5 also entitled to profits attributable to defendants' unauthorized use of their
6 likenesses, names and letter.

7 118. Upon information and belief, defendants have engaged in the
8 conduct alleged above with oppression, fraud and malice. Accordingly, plaintiffs
9 are entitled to an award of punitive and exemplary damages in an amount to be
10 proved at trial.

11 **ELEVENTH CLAIM FOR RELIEF**

12 (Violation of Right of Publicity by Kathryn Li and Robert Milliken
13 against all Defendants)

14 (*California Civil Code* § 3344 and the Common Law)

15 119. Plaintiffs Kathryn Li and Robert Milliken incorporate and re-allege
16 paragraphs 1-118 of this Complaint.

17 120. Through their talent and hard work developing natural, organic
18 topical and ingestible skin care products, plaintiffs Kathryn Li and Robert Milliken
19 have developed and earned considerable good will and commercial value in their
20 names, images, and likenesses among persons selling, distributing and purchasing
21 natural, organic topical and ingestible skin care products. Their likenesses convey a
22 sense of integrity and scientific accomplishment.

23 121. Plaintiffs never agreed to allow the use of their names or likenesses
24 in connection with the marketing, advertising, distribution or sale of defendants'
25 products.

26 122. By using plaintiffs' names and likenesses in conjunction with the
27 advertising of their products, defendants have knowingly misappropriated plaintiffs'
28 names and likenesses for commercial gain.

1 123. The acts alleged above constitute a violation of *California Civil*
2 *Code* § 3344 and plaintiffs' common law right of publicity.

3 124. As a direct and proximate result of defendants' acts alleged above,
4 plaintiffs have been damaged in an amount to be proved at trial. Plaintiffs are also
5 entitled to all profits attributable to defendants' unauthorized use of their names and
6 likenesses.

7 125. Pursuant to *California Civil Code* § 3344(a), plaintiffs are also
8 entitled to recover reasonable attorneys' fees.

9 126. Upon information and belief, defendants have engaged in the
10 conduct alleged above with oppression, fraud and malice. Accordingly, plaintiffs
11 are entitled to an award of punitive and exemplary damages in an amount to be
12 proved at trial.

13 **TWELFTH CLAIM FOR RELIEF**

14 (California Statutory Unfair Competition by Rena against all Defendants)

15 127. Plaintiff Rena incorporates and re-alleges paragraphs 1-126 of this
16 Complaint.

17 128. Defendants' acts described above constitute fraudulent and unlawful
18 business practices as defined by *California Business & Profession Code* § 17200
19 et seq.

20 129. Plaintiffs have valuable and protectable rights in their RENA and
21 RENA BIOTECHNOLOGY word and design marks. Those marks are inherently
22 distinctive, and, through plaintiffs' use, have come to be associated in the market
23 solely with Rena, which is well known as the source of the products on which they
24 are used.

25 130. Defendants' sale of their infringing products is likely to cause
26 confusion as to the source of their Activation Energy Serum, and other products, and
27 is likely to cause consumers and sales representatives to be confused or mistaken
28

1 into believing that there is a relationship between defendants and Rena, or that
2 defendants' products are affiliated with or sponsored by Rena.

3 131. Defendants' use of deceptively similar Internet domain names for
4 sites that are copied heavily from and derivative of Rena's official website is likely
5 to cause others to be confused or mistaken into believing that there is a relationship
6 between defendants and Rena, or that defendants' products are affiliated with, or
7 sponsored by, Rena. The fraudulent business practices of Defendants, including
8 their cybersquatting of domain names, infringement of Rena's copyrighted
9 materials, theft and use of Rena's trade secret information, and intentional
10 interference with Rena's prospective economic advantage further constitute unfair
11 competition and fraudulent business practices.

12 132. As a direct and proximate result of defendants' wrongful conduct,
13 Rena and Kathryn Li have been injured in fact, and have lost money and profits, and
14 such harm will continue unless defendants' acts are enjoined by the Court. Rena
15 and Kathryn Li have no adequate remedy at law for defendants' continuing violation
16 of their rights.

17 133. Defendants should be required to restore to Rena and Kathryn Li
18 any and all profits earned as a result of their unlawful and fraudulent actions, or
19 provide Rena and Kathryn Li with any other restitution or relief as the Court deems
20 appropriate.

21 **THIRTEENTH CLAIM FOR RELIEF**

22 (California Common Law Unfair Competition by Rena against all Defendants)

23 134. Plaintiff Rena incorporates and re-alleges paragraphs 1-133 of this
24 Complaint.

25 135. Plaintiff's genuine RENA products have acquired a secondary
26 meaning among leaders, sales representatives, and consumers in the natural, organic
27 topical and ingestible skin care products market as associated with, and emanating
28 from, Rena.

1 136. Defendants, through the marketing of their directly competing
2 products, have unfairly imitated the name and appearance of Rena's products and, in
3 doing so, have competed unfairly with Rena.

4 137. Rena is, therefore, entitled to an award of its actual damages and,
5 because defendants acted with oppression, fraud, and malice, Rena is further entitled
6 to an award of punitive and exemplary damages in an amount to be proved at trial.

7 **FOURTEENTH CLAIM FOR RELIEF**

8 (Violation of the Racketeer Influenced and Corrupt Organizations Act

9 by Rena against all Defendants)

10 (18 U.S.C. §§ 1962(c) and 1964(c))

11 138. Plaintiff Rena incorporates and re-alleges paragraphs 1-137 of this
12 Complaint.

13 139. Beginning from approximately 2008 through the filing of this
14 Complaint, and continuing into the future, in the Central District of California and
15 elsewhere, Defendants Lin, Simone, Ko, and Does 3-10 have, directly and
16 indirectly, knowingly participated in the conduct of, and operated and managed, Sis-
17 Joyce, an enterprise by which they are employed or associated and whose conduct
18 and activities affect interstate or foreign commerce (the "Criminal Enterprise"),
19 through a pattern of racketeering activity, and in so doing injured Rena in its
20 business and property. Defendants' actions include multiple, related acts in
21 violation of: 18 U.S.C. § 1341 (mail fraud), 18 U.S.C. § 1343 (wire fraud), 18
22 U.S.C. § 2319(a) and 17 U.S.C. § 506(a) (criminal copyright infringement), 18
23 U.S.C. § 2320 (trafficking in counterfeit goods).

24 140. The predicate acts alleged herein occurred after the effective date of
25 18 U.S.C. §§ 1961 et seq., and the last such act occurred within 10 years after the
26 commission of a prior act of racketeering activity. These racketeering activities
27 include repeated acts of:
28

1 (a) Criminal Copyright Infringement. Defendants Lin,
2 Simone, Ko, and Does 3-10 willfully infringed and continue to willfully infringe
3 Rena's copyrights, including without limitation with respect to copyrighted material
4 on the AmericanRena.com website, for purposes of commercial advantage and
5 private financial gain, all in violation of 18 U.S.C. § 2319(a) and 17 U.S.C. §
6 506(a)(1)(a), (c), as alleged with greater particularity in the foregoing paragraphs.

7 (b) Trafficking in Counterfeit Goods. Defendants Lin,
8 Simone, Ko, and Does 3-10 intentionally trafficked and continue to intentionally
9 traffic in goods while knowingly using a counterfeit mark on and in connection with
10 such goods, and attempted and conspired to do so, including by selling non-genuine
11 products bearing the RENA and RENA BIOTECHNOLOGY marks and by using
12 the RENA and RENA BIOTECHNOLOGY marks, including on packaging, to sell
13 goods bearing the "ARena" label in a manner likely to deceive and cause mistake
14 and confusion, all in violation of 18 U.S.C. § 2320(a)(1, 2), as alleged with greater
15 particularity in the foregoing paragraphs.

16 (c) Mail and Wire Fraud. The Criminal Enterprise was and is
17 engaged in a scheme to defraud involving the conduct set forth herein, including by
18 willfully infringing Rena's intellectual property rights, counterfeiting Rena's goods,
19 misleading consumers and making false and fraudulent statements to Rena
20 members, including on the Internet, all in an effort to unlawfully hijack Rena's
21 business, property and rights. Defendants Lin, Simone, Ko, and Does 3-10, having
22 devised such a scheme to defraud, did for the purpose of furthering and executing
23 this scheme transmit and cause to be transmitted by means of wire communications
24 in interstate or foreign commerce, writing, signs, signals, pictures and sound, and
25 deposit or cause to be deposited matters or things to be sent or delivered by mail and
26 by commercial interstate carriers, and take or receive matters or things therefrom, in
27 violation of 18 U.S.C. § 1341, 18 U.S.C. § 1343, 18 U.S.C. § 1346, and 18 U.S.C.
28 § 2, including without limitation by transmitting documents in furtherance of the

1 fraudulent scheme including the email messages attached hereto as Exhibit A, by
2 providing false information when registering the fraudulent and infringing
3 renaskin.com website, by causing the publication on the Internet of the fraudulent
4 and infringing renaskin.com and arenaskin.com websites that among other things
5 make counterfeit use of the RENA and RENA BIOTECHNOLOGY marks, by
6 willfully infringing Rena's copyrights and falsely purporting to advertise and sell
7 "Genuine American Rena" products, and by causing the publication on YouTube of
8 fraudulent and infringing videos, uploaded under the name "tvstripel" on or about
9 June 2, 2010 and August 25, 2011, that among other things make counterfeit use of
10 the RENA and RENA BIOTECHNOLOGY marks and products and purport to
11 advertise and sell genuine American Rena products, but direct consumers to the
12 fraudulent and infringing renaskin.com website.

13 141. Rena has been injured in its business or property as a direct and
14 proximate result of Defendants' violations of 18 U.S.C. § 1962(c), including injury
15 by reason of the predicate acts constituting the pattern of racketeering activity, as
16 alleged with greater particularity in the foregoing paragraphs.

17 142. As a result of Defendants' violations of 18 U.S.C. § 1962(c), Rena
18 has suffered substantial damages, in an amount to be proved at trial. Pursuant to 18
19 U.S.C. § 1964(c), Rena is entitled to recover treble its general and special
20 compensatory damages, plus interest, costs and attorneys fees, incurred by reason of
21 Defendants' violations of 18 U.S.C. § 1962(c).

22 **FIFTEENTH CLAIM FOR RELIEF**

23 (Conspiracy to Violate the Racketeer Influenced and Corrupt Organizations Act

24 by Rena against all Defendants)

25 (18 U.S.C. §§ 1962(d) and 1964(c))

26 143. Plaintiff Rena incorporates and re-alleges paragraphs 1-142 of this
27 Complaint.
28

1 144. Beginning from approximately 2008 through the filing of this
2 Complaint, and continuing into the future, in the Central District of California and
3 elsewhere, Defendants Lin, Simone, Ko, and Does 3-10 and others acting in concert
4 with or on behalf of them, knowingly, willfully, and unlawfully, did conspire,
5 combine, confederate and agree together to violate 18 U.S.C. § 1962(d) by
6 furthering, promoting, and facilitating the Criminal Enterprise as detailed above, in
7 violation of 18 U.S.C. § 1962(c).

8 145. In furtherance of this unlawful conspiracy and its multiple objects,
9 as alleged herein, Defendants Lin, Simone, Ko, and various co-conspirators
10 committed numerous overt acts, including but not limited to those set forth above.

11 146. Rena has been injured in its business or property as a direct and
12 proximate result of Defendants' violations of 18 U.S.C. § 1962(d), including injury
13 by reason of the predicate acts constituting the pattern of racketeering activity. As a
14 result of the conspiracy between and among Defendants to violate 18 U.S.C.
15 § 1962(c), Rena has suffered substantial damages, in an amount to be proved at trial.
16 Pursuant to 18 U.S.C. § 1964(c), Rena is entitled to recover treble its general and
17 special compensatory damages, plus interest, costs and attorneys fees, incurred by
18 reason of Counter-defendants' violations of 18 U.S.C. § 1962(d).

19 **SIXTEENTH CLAIM FOR RELIEF**

20 (Unjust Enrichment by Rena against all Defendants)

21 147. Plaintiff Rena incorporates and re-alleges paragraphs 1-146 of this
22 Complaint.

23 148. As a direct and proximate result of the misconduct set forth above,
24 defendants have been unjustly enriched, to Rena's detriment. Rena seeks a
25 worldwide accounting and disgorgement of all ill-gotten gains and profits resulting
26 from defendants' inequitable activities.

27

28

PRAYER FOR RELIEF

WHEREFORE, plaintiffs American Rena International Corp., WanZhu, “Kathryn” Li and Robert M. Milliken demand judgment:

1. That defendants, their agents, servants and employees, and all persons acting in concert with them, be preliminarily and permanently enjoined from engaging in the unlawful conduct set forth herein, including in that they be enjoined from, directly or indirectly infringing plaintiff Rena’s RENA and RENA BIOTECHNOLOGY trademarks; making any commercial use or use in commerce of or references to the RENA or RENA BIOTECHNOLOGY marks; making any commercial use or use in commerce of or references to the “ARëna,” “aRena,” “aRENA,” or “NEW! ARëNA ACTIVATION ENERGY SERUM” marks; making any commercial use or use in commerce of or references to “New Rena” or “Rena;” making any commercial use or use in commerce of or references to photographs or images of plaintiffs Li and/or Milliken; making any commercial use or use in commerce of or references to any of Rena’s copyrighted materials, including those materials that appear on the AmericanRena.com website; making any commercial use or use in commerce of or references to any brochures, fliers, or websites that misappropriate the content or use any photographs, illustrations, or textual material, or that copy the look and feel, of Rena’s brochures, fliers and website; making any commercial use or use in commerce of or references to product bottles or containers that are confusingly similar to product bottles or containers used by Rena, or any trade dress employed by Rena; and from otherwise engaging in unfair competition with Rena or interfering improperly with any prospective economic advantage enjoyed by Rena, including by providing misleading or false information to Rena customers.

2. An order directing the United States Patent and Trademark Office to cancel the purported “NEW! RëNA ACTIVATION ENERGY SERUM” mark registered pursuant to Certificate of Registration No. 4,002,069.

1 3. An order directed to Network Solutions. Inc., directing that
2 ownership of the www.Renaskin.com and www.Arenaskin.com domain names be
3 transferred to Li.

4 4. That plaintiffs Li and Milliken be awarded damages for the false-
5 light invasions of their privacy and violations of their rights of publicity.

6 5. That Rena recover its actual damages and lost profits, and that it be
7 awarded an amount equal to defendants' unjust enrichment to the extent that such
8 unjust enrichment is not reflected in the award of damages, and that a constructive
9 trust in favor of Rena be imposed over defendants' ill-gotten gains and profits.

10 6. That defendants be ordered to pay punitive and exemplary damages
11 in a sum sufficient to punish and make an example of them, and deter them and
12 others from similar wrongdoing.

13 7. That defendants be ordered to pay double damages due to their
14 willful and malicious misappropriation of Rena's trade secrets.

15 8. That defendants be ordered to pay trebled general and special
16 damages, together with interest thereon, costs and attorneys' fees, incurred by
17 reason of their violations of 18 U.S.C. §§ 1962(c) - (d).

18 9. That defendants pay to plaintiffs the full cost of this action and
19 plaintiffs' attorneys' fees and investigator's fees.

20 10. That plaintiffs have such other and further relief as the Court may
21 deem just and proper.

1 DATED: March 26, 2013

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Bruce E. Van Dalsem
David W. Quinto
B. Dylan Proctor

5 

By

Bruce E. Van Dalsem
David W. Quinto
B. Dylan Proctor
Attorneys for American Rena International
Corp., WanZhu "Kathryn" Li, and Robert
M. Milliken

IT

----- Forwarded Message -----

From: virginia wu <virginiachu7@yahoo.com>
To: virginiachu7@yahoo.com
Sent: Sunday, February 13, 2011 12:51 AM
Subject: New Rena Company is lunched

Dear Arena gold members,

Bank: CHASE BANK

SWift code: CHASUS33

Account: 946067170

Company: Sis-Joyce International Co.LTD

New Rena product has arrived. The product name called Arena. Company will open on the end of the February. Member can reorder the product now.

Please deposit the premium of US\$1527.39 (No Tax - Promotion) to the above Bank account, and email to me virginiachu7@yahoo.com for indicating the member's old ID#, Name, Tel#, Address.

Company will ship the order to your address. Package including 10 bottles of concentrate and 2 empty bottles. The member in out of state will receive 11 bottles of concentrate.

I will provide all the member's order record to the Company. When the Company computer system are ready around beginning of the March, All member's commission will be paid.

So, please grab this chance, I believe we can do better, bigger and easier at this time. Any questions please call me or email me. Thank you. 626-329-3991

在加州的會員訂貨須知:

10瓶50倍的濃縮液, 沒有外面的紙合包裝, 加上二瓶30ml的能量空瓶.

外面的紙合包裝以後會補發給會員.

目前促銷中, 含稅只須付 US\$ 1,527.39元. 請直接存入上面的Account. 存完後請 E-mail給virginiachu7@yahoo.com 請告知您在舊的ID號碼#, 姓名, 電話, 及郵寄地址.

公司馬上會把貨郵寄到您要的地址, 必須要有人簽收.

外州及其它國家的會員訂貨須知:

11瓶50倍的濃縮液, 沒有外面的紙合包裝, 加上二瓶30ml的能量空瓶.

外面的紙合包裝以後會補發給會員。

目前促銷中。只須付 US\$ 1,527.39元。(就多了一瓶) 請直接存入上面的Account.

存完後請 E-mail給 virginiachu7@yahoo.com 請告知您在的舊ID號碼 #,
姓名, 電話, 及郵寄地址。公司馬上會把貨郵寄到您要的地址, 必須要有人簽收。

讓我集合在一起報備給公司, 待電腦系統都完成後, 公司馬上會把獎金撥下來。

Best regard,
Virginia Wu
626-329-3991

EXHIBIT A

IT

— Forwarded Message —

From: virginia wu <virginiachu7@yahoo.com>
To: Margaux Cheng <regency898@yahoo.com.tw>; ROB SIMONE <robsimonetalks@yahoo.com>; Lisa Canada <lisa_ma@yahoo.com>
Cc: Kavina Chang <globalfreestore@yahoo.com>; Simon Ma Rena <simonma7@yahoo.com>
Sent: Wednesday, March 16, 2011 11:42 AM
Subject: Arena needs your information

Dear all,

It is good to hear that Arena (2nd generation of Rena) is finally open for our members. Now all we need to do is go to the back office key in your personal information. Later we will notify you how to activate your account for the member who has ordered product.

Go to sisjoyce.com

go to office => member log in (please add 6 before your member ID and password)
go to Manage my account => Personal information (Remember ID# is your Social Security #)

Please call me if you have any questions.

Have a good day
Virginia

EXHIBIT A

IT

----- Forwarded Message -----

From: virginia wu <virginia7@yahoo.com>

To: ROB SIMONE <robsimonetalks@yahoo.com>; Lisa Canada <lisa_ma@yahoo.com>; Jane Wang Rena <tojxw@yahoo.com>; Kavina Chang <globalfreestore@yahoo.com>; Tina Rena <tinalee4rena@yahoo.com>; Vanessa Canada <vanessawong_ca@yahoo.ca>; Wendy Li Rena <syli233@hotmail.com>; Margaux Cheng <regency898@yahoo.com.tw>

Sent: Monday, February 21, 2011 12:54 AM

Subject: Fw: Re : Very Exciting Update News !

Dear All Members :

The Top Leader, Annie Lin

She has very exciting news for everyone!

On the Feb-26-11 Pm 3:00-6:00

Feb-27-11 Pm 1:00-5:00

All members that attend will receive complementary gifts and also be eligible for a raffle for the patented micro-molecular Activation energy bottle.

Special thanks to Alice Hsu for providing us with the meeting location!

感謝我們的大 Leader Annie Lin 將專程給我們帶來令人興奮的好消息。
會議的時間如下。

2月26日 Pm 3:00-6:00

2月27日 Pm 1:00-5:00

我們有抽獎活動，獎品非常豐富，達到千元以上。

其中包括有專利的能量瓶。

EXHIBIT A

Best Regard
Virginia

2

Exhibit C

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Bruce E. Van Dalsem (Bar No. 124128)

3 brucevandalsem@quinnemanuel.com

4 David W. Quinto (Bar No. 106232)

5 davidquinto@quinnemanuel.com

6 B. Dylan Proctor (Bar No. 219354)

7 dylanproctor@quinnemanuel.com

8 865 South Figueroa Street, 10th Floor

9 Los Angeles, California 90017-2543

10 Telephone: (213) 443-3000

11 Facsimile: (213) 443-3100

12 Attorneys for American Rena International

13 Corp.; WanZhu “Kathryn” Li; Robert M.

14 Milliken

15 UNITED STATES DISTRICT COURT

16 CENTRAL DISTRICT OF CALIFORNIA

17 WESTERN DIVISION

18 American Rena International Corp., a
19 California corporation; WanZhu
20 “Kathryn” Li, an individual; and Robert
21 M. Milliken, an individual,

22 Plaintiffs,

23 vs.

24 Sis-Joyce International Co., Ltd., a
25 California corporation; Alice “Annie”
26 Lin, an individual; Robert Simone, an
27 individual; Christine Ko, an individual;
28 and DOES 3-10,

Defendants.

CASE NO. CV-12-06972-FMO (JEMx)

**DECLARATION OF RYAN Q.
KEECH REGARDING SERVICE
OF FIRST AMENDED
COMPLAINT ON ROBERT
SIMONE PURSUANT TO ORDER
AUTHORIZING SERVICE BY
ALTERNATIVE MEANS (DKT. 50)**

DECLARATION OF RYAN Q. KEECH

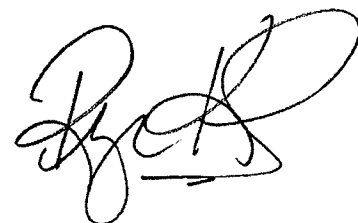
I, Ryan Q. Keech, declare as follows:

1. I am a member of the bar of the State of California and an associate with Quinn Emanuel Urquhart & Sullivan LLP, attorneys for plaintiffs American Rena International Corp., WanZhu "Kathryn" Li, and Robert M. Milliken. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. On April, 1, 2013, pursuant to the Court's Order authorizing e-mail service of defendant Robert Simone in this action, including "the Summons, Compliant, Amended Complaint, and any other papers required to be served upon Mr. Simone," Dkt. 50, I served defendant Robert Simone with the First Amended Complaint and Summons. I did so by attaching true and correct copies of these documents to an e-mail communication that was successfully transmitted to the e-mail addresses robsimonetalks@yahoo.com; renausal@gmail.com; and submitmystuff@yahoo.com. Attached hereto as Exhibit A is a true and correct copy of this e-mail communication.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 13, 2013, at Los Angeles, California.



Ryan Q. Keech

Exhibit A

Ryan Keech

From: Ryan Keech
Sent: Monday, April 01, 2013 7:41 PM
To: 'submitmystuff@yahoo.com'; 'renausa1@gmail.com'; 'robsimonetalks@yahoo.com'
Cc: American Rena QE Team
Subject: American Rena Int'l Corp., et al v. Sis-Joyce Int'l Co., Ltd., et al (Case No. CV-12-06972-FMO (JEMx) (C.D. Cal.))
Attachments: Dkt. 50.pdf; Dkt. 86.pdf; Dkt. 107.pdf; FAC.pdf; Civil Cover Sheet; Summons; Notice of Assignment to Magistrate Judge.pdf

Mr. Simone:

Please see the attached documents, which are being served on you this evening pursuant to the Court's order authorizing e-mail service of all papers in this action.

Regards,

Ryan Q. Keech

Associate

Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
213-443-3255 Direct
213-443-3000 Main Office Number
213-443-3100 Fax
ryankeech@quinnemanuel.com
www.quinnemanuel.com

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ORIGINAL

Name & Address:

QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Bruce E. Van Dalsem (Bar No. 124128)
 David W. Quinto (Bar No. 106232)
 B. Dylan Proctor (Bar No. 219354)
 865 S. Figueroa St., 10th Fl., Los Angeles, CA 90017

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

American Rena International Corp., a California
 corporation; Wanzhu "Kathryn" Li, an individual; and
 Robert M. Milliken, an individual,

PLAINTIFF(S)

v.

Sis-Joyce International Co., Ltd., a California corporation;
 Alice "Annie" Lin, an individual; Virginia Wu, an
 individual; and Does 1 - 10,

DEFENDANT(S).

CASE NUMBER

CV12 06972 DMG (JEMx)**SUMMONS**

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Bruce E. Van Dalsem, whose address is 865 S. Figueroa Street, 10th Fl., Los Angeles, CA 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 8/13/12By: 

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Exhibit D

Attorney or Party without Attorney: BRUCE E. VAN DALSEM, ESQ., Bar #124128 QUINN EMANUEL URQUHART & SULLIVAN, LLP 865 SOUTH FIGUEROA STREET 10TH FLOOR LOS ANGELES, CA 90017 Telephone No: 213-443-3000			For Court Use Only		
Attorney for: Plaintiff			Ref. No. or File No.:		
Insert name of Court, and Judicial District and Branch Court: United States District Court, Central District Of California					
Plaintiff: AMERICAN RENA INTERNATIONAL CORP., ET AL. Defendant: SIS-JOYCE INTERNATIONAL CO., LTD., ET AL.					
PROOF OF SERVICE SUMMONS & COMPLAINT		Hearing Date:	Time:	Dept/Div:	Case Number: CV12 06972 DMG (JEMX)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the SUMMONS; FIRST AMENDED COMPLAINT; CIVIL COVER SHEET; NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY; LETTER DATED MARCH 29, 2013
3. a. Party served: CHRISTINE "NINA" KO, AN INDIVIDUAL
4. Address where the party was served: 773 BARNUM WAY
MONTEREY PARK, CA 91754
5. I served the party:
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive process for the party (1) on: Fri., Apr. 05, 2013 (2) at: 12:02PM
7. Person Who Served Papers:

a. Kevin Appleton b. FIRST LEGAL INVESTIGATIONS 2112 N. MAIN STREET SUITE 220 SANTA ANA, CA 92706 c. (714) 550-1375	d. The Fee for Service was: e. I am: (3) registered California process server (i) Independent Contractor (ii) Registration No.: 4955 (iii) County: Los Angeles
---	--

Recoverable Cost Per CCP 1033.5(a)(4)(B)

8. I declare under penalty of perjury under the laws of the State of California and under the laws of the United States Of America that the foregoing is true and correct.
 Date: Mon, Apr. 08, 2013

ORIGINAL

Name & Address:

QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Bruce E. Van Dalsem (Bar No. 124128)
 David W. Quinto (Bar No. 106232)
 B. Dylan Proctor (Bar No. 219354)
 865 S. Figueroa St., 10th Fl., Los Angeles, CA 90017

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

American Rena International Corp., a California
 corporation; Wanzhu "Kathryn" Li, an individual; and
 Robert M. Milliken, an individual,

PLAINTIFF(S)

v.

Sis-Joyce International Co., Ltd., a California corporation;
 Alice "Annie" Lin, an individual; Virginia Wu, an
 individual; and Does 1 - 10,

DEFENDANT(S).

CASE NUMBER

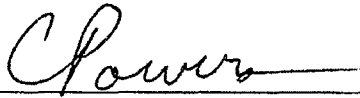
CV12 06972 DMG (JEMx)**SUMMONS**

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Bruce E. Van Dalsem, whose address is 865 S. Figueroa Street, 10th Fl., Los Angeles, CA 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 8/13/12By: 
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Exhibit E

1
2
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4
5
6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA
8

9 AMERICAN RENA INTERNATIONAL)
10 CORP., et al.,)

11 Plaintiffs,)

12 v.)

13 SIS-JOYCE INTERNATIONAL CO.,)
LTD., et al.,)

14 Defendants.)
15

NO. CV 12-06972 FMO (JEMx)

ORDER

16 IT IS ORDERED THAT:

17 1. Plaintiffs' Unopposed Motion for Leave to File a First Amended Complaint (**Document**
18 **No. 106**) is **granted**.

19 2. Plaintiffs shall, no later than two court days from the filing of this Order, file their First
20 Amended Complaint in compliance with Local Rule 3-2.

21 3. Defendants shall file their Answer to the First Amended Complaint or a motion pursuant
22 to Fed. R. Civ. P. 12 no later than **April 11, 2013**.

23 Dated this 26th day of March, 2013.

24 _____ /s/
25 Fernando M. Olguin
26 United States District Judge
27
28